



Radio 23
720 NE 76th Ave
Portland, OR 97213

December 8, 2010

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: LPFM Proceeding

Dear FCC:

My name is Jeff Hylton Simmons from Portland, Oregon. I am Director of the non-profit Radio 23. In the last few years we have been attempting to help start a student/community radio service for the local Portland arts and music community. Because there are no full power channels open, we have been setting our hopes on LPFM. However, after reading a report submitted on the LPFM docket by Common Frequency regarding the predicted availability of LPFM channels in Portland, we are worried that no channels will be available in Portland.

There are about NINE translators licensed on the commercial band in the Portland city area, and one on the NCE band, equaling TEN translators. If the FCC moves forward with this "ten cap", SEVEN more translators could be licensed for a total of SEVENTEEN translators in Portland. If this happens, in the end, there will be no room left for LPFM in downtown Portland. This was shown to be a possibility in Common Frequency's simulated engineering report.

We wish for the FCC to move forward on a translator plan that **protects localism**. Just in the greater Portland metro, we get satellite-relayed programming from the religious broadcaster KLOVE/AIR-1 on **SEVEN** radio channels (K249DK, K240CZ, K224CP, K242AF, K274AR, KLVP, and KZRI). Another out-of-town religious broadcaster, WAY-FM, has **THREE** translators (K272EL, K228EU, K284BF), and religious broadcaster Calvary Satellite Network has **FOUR** in the vicinity (K273AI, K231AM, K288FT, K220IN).

Yet there is **not one full power NCE FM "college radio" format station in**

Portland. Reed College has a 10 watt Class D station that is slated to go off the air due to commercial radio encroachment. Portland State University once leased air time on a AM radio station. That AM station dropped PSU's programming this summer. On the outskirts of the Portland region there are some rural LPFM stations that are being displaced by a full power commercial station that is moving in to Portland.

It would seem like local educational radio is **on the decline** in Portland, out-of-town network programming via translator service is **on the rise**, and LPFM in downtown Portland is likely to be **dead on arrival** with the FCC's "ten cap" approach. We ask the FCC to **halt all further licensing of translators in Portland until there is an LPFM filing window.** **There are already enough translators here.**

The possibility **SEVENTEEN** translators and **ZERO** LPFMs serving downtown Portland is not in the public interest and will not aid in preserving broadcast localism.

Sincerely,

Jeff Hyton Simmons
Radio 23

cc: Rosemary Harold, Dave Grimaldi, Krista Witanowski, Joshua Cinelli, Sherrese Smith, Peter Doyle